



YELENA SHAROVA, ESQ. *+
SASSY DUMORNAY ESQ. *
CHARLES KASER ESQ. *
NANI KIM ESQ. *
CHARLES MARINO ESQ. *
BRUCE PROVDA ESQ. * (1947-2022)
THOMAS J. TYRRELL JR. ESQ. *
*NY +NJ

Telephone 1.718.766.5153
Facsimile 1.718.504.3599
Email cmarino@sharovalaw.com

PARALEGALS:
FRANKLIN DAVIS JR
ALVIN KORSUNSKIY
CELINA QUEVEDO
MABEL SANTANA
GRIGORIY SHUBA
HANNA SKARULIS
VIKTORIA FEDARAVA

December 14, 2022

VIA ELECTRONIC FILING

Honorable John Koeltl
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: US v. Herrera 21 Cr. 680 (JGK)

Dear Judge Koeltl:

Counsel for Steven Herrera respectfully submits this letter to request permission to 64 Beaver Street in New York, New York and 203 9th Street, Brooklyn NY 11215 in order to complete his application for employment.

Mr. Herrera has secured a fully remote job as a customer service representative with HSA/ Webster Bank. As a requirement for the job Mr. Herrera is required to appear for a drug test and background check via fingerprinting on December 16, 2022. Attached is a copy of Mr. Herrera's employment condition.

It is my understanding that Pretrial Services, through Officer Marlon Ovalles, objects to this request due to the fact that it is against office policy for additional travel while on home incarceration. However, Pretrial states that Mr. Herrera remains in full compliance with the conditions of his release. Additionally, the Government, through Assistant US Attorney Kaylan Lasky defers to pretrials.

Our office believes Mr. Herrera should be granted his travel request over Pretrials objections. As part of Mr. Herrera's original pretrial conditions, it states that Mr. Herrera should continue to seek employment. This position is a fully remote, meaning that he will be able to perform his duties at home which would be within his current conditions. Also, this would be a one-time travel request within the Southern District of New York.

Thank you for your time and attention in this matter.

Respectfully Submitted,

Application granted. The defendant should advise Pre-Trial Services of the details of when he leaves and returns to his home. SO ordered. J. G. Keller / U.S.D.S. 12/14/22



Charles Kaser
Attorney for the Defendant
By: /s/ *Charles Kaser*

CC: All Parties (via ECF)